

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,

v.

Crim. No. 04-10345-NMG

MOHAMMED ABDUL RASHEED QURAISHI,
MOHAMMED ABDUL QAYIUM QURAISHI,
MOHAMMED ABDUL AZIZ QURAISHI,

Defendants.

EMERGENCY MOTION FOR EARLY RELEASE
OR, IN THE ALTERNATIVE, FOR TEMPORARY RELEASE

Defendants Mohammed Abdul Aziz Quraishi ("Aziz") and Mohammed Abdul Qayium Quraishi ("Farees") respectfully move this Court, on an emergency basis, for an early release from prison to visit their dying mother and administer her last rites. Aziz and Farees have served approximately seven (7) months of a ten (10) month sentence at a federal prison in Texas. In light of their dire family circumstances, they respectfully request an early release so that they can visit with their mother during her final days and, if possible, perform her last rites. In the alternative, they respectfully request a temporary release from prison pursuant to 18 U.S.C. § 3622. In support of this motion, Aziz and Farees state as follows:

1. On November 18, 2004, Aziz and Farees pled guilty to Encouraging and Inducing Aliens to Come to, Enter and Reside in the United States in violation of Law, in violation of 8 U.S.C. §1324(a)(1)(A)(iv) and 18 U.S.C. § 2 and Witness Tampering, in violation of 18 U.S.C. § 1512(b)(3). Aziz was sentenced on April 10, 2007 to ten (10) months in the Bureau of Prisons (BOP), twenty-four (24) months of supervised release, a

Emergency motion for early release is denied; emergency motion for temporary release is allowed for a period not to exceed four (4) days and provided that, upon temporary release from Bureau of Prisons custody, defendants shall, at their own expense, proceed forthwith to Massachusetts and return to the designated Bureau of Prisons facility within the allotted time of release. JMG/Gorton USDT 12/28/07